

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS EMILY ROSENBERG  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
(APWU/USPS-T3-29)**

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-listed interrogatory of the American Postal Workers Union dated February 24, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T3-29** Please refer to column L-O MODS volumes and the column-BC PRCL demand units reported in N2012-1/NP2, tab 'Model MODS'. Please confirm that any given sum over these column L-O MODS volumes always converts into the exact same column BC demand unit, regardless of the ZIP3 in column A. If you do not confirm, please explain.

**RESPONSE:**

Confirmed. The same formula is used for 3-digit ZIP Code-shape square footage calculation for all ZIP Codes.